

## **Reasonable Doubt #7: Forensic Evidence Tying Holly to the Murder**



## Reasonable Doubt #8: Walmart Purchase

ST# 5211 OP# 00006937 TE# 77 TR# 00804

TE# 77 OP# 00006937 TR# 00804

DT 091920 TM 161336

DATE: 04/24/1987

TE# 77 OP# 00006937 TR# 00804

DT 091920 TM 161356

AMMUNITION 002089201657S 11.97 AD

UTL LIGHTER 007033060845S 3.14 AD

TE# 77 OP# 00006937 TR# 00804

DT 091920 TM 161406

TE# 77 OP# 00006937 TR# 00804

DT 091920 TM 161407

CAMP KNIFE 001616219432S 9.46 AD

UTL LIGHTER 007033060845S 3.14 AD

SALES TAX 1 2.29

TOTAL 30.00

SUBTOTAL 27.71

CASH TEND 40.00

CHANGE DUE 10.00

\*\*\*SURVEY OFFERED\*\*\*

TC# 5333 1276 1280 2202 8921

09/19/20 16:14:38

DEFENDANT'S EXHIBIT  
DX 173  
USA v. Elkins, 3:23-CR-247B



## Reasonable Doubt #9: Ammunition & Knife

*Summary Table for Shot Size Determination Results for IFS-20-18377, Request 0010 issued on April 19, 2023:*

Item #	Shot Size		
	Consistent with # 4	Consistent with # 4 & # 5	Consistent with # 6
6-7	17 pellets	-	-
34-1-1	5 pellets	-	-
34-1-2	-	-	11 pellets
35-1-1	-	4 pellets	-
35-1-2	-	-	8 pellets
36-1-1	-	6 pellets	-
36-1-2	-	-	10 pellets
36-2-1	2 pellets	-	-
36-2-2	-	-	4 pellets
<b>Totals:</b>	<b>24 pellets</b>	<b>10 pellets</b>	<b>33 pellets</b>

Overall Total: 67 pellets

<p><b>Other Comments:</b></p> <p>WE NEED TO CONFIRM THAT THE RECOVERED ITEMS ARE CONSISTENT WITH --- .410 GAUGE SIZE 6 SHOT.</p> <p>LB27</p>
--

DEFENDANT'S EXHIBIT

400

3:23-CR-00247B

DEFENDANT'S EXHIBIT

A 224

3:23-CR-00247B

## Reasonable Doubt #9: Ammunition & Knife





## Reasonable Doubt #10: “Alibi”



## **Reasonable Doubt #11: Heads The Government Wins. Tails Holly Loses.**



## Reasonable Doubt #12: Andrew Beard is not a Normal Human.

the United States." See 18 U.S.C. § 1331. Defendant asserts his intention to file a federal counter claim under 42 U.S.C. § 1983 against both Plaintiffs and attorney representative Aaron Herbert.

31007 Defendant's counter claim will show the court(s) that Plaintiffs and Mr. Herbert, willingly and knowingly committed multiple violations of 28 U.S.C. § 1510 (obstruction of a criminal investigation) and/or 28 U.S.C. § 1512 (tampering with a witness) and/or Intentional Infliction of Emotional Distress, starting on October 2<sup>nd</sup>, 2020 and continued through on or about October 20<sup>th</sup>, 2022.

31008 Pending either removal of this case to dismissal/ removal of this case from the court's jurisdiction/ willingness to engage in any settlement/ counter claim until or any settlement can be reached, which Appendix

Page 16 of 31



Andrew Beard after admitting, before this very Court, that he had killed Teresa Collard's daughter:

**"Teresa Collard willingly and knowingly inflicted emotional distress upon me from October 2, 2020, through October 20, 2020."**

## Reasonable Doubt #13: Custody Battle Raging Until The End.

**LAW OFFICES OF SHIRLEY SUTHERLAND**  
905 Ralph Hall Parkway, Suite 105  
Rockwall, Texas 75087  
Telephone (972) 771-0111  
Facsimile (866) 417-7473  
e-mail ss@shirleyslaw.com

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September 15, 2020

Jeremy Ewert  
Via Email

**RULE 11 AGREEMENT**

Re: Beard/Burkett Cause No. 1-19-1345


Dear Jeremy,

In regard to our telephone conference please see the Rule 11 below

1. Teresa Burkett-Collard can no longer provide care for Willow Beard, nor can she be a designated adult for pick up or delivery of the child. Nor can she come within 500 feet of Andrew Beard's home.
2. Madison Grimes can no longer provide care for Willow Beard, nor can she be a designated adult for pick up or delivery of the child.
3. Starting September 16, 2020, Willow Beard will attend Kiddie Academy and Alyssa Burkett will pay the entire tuition associated with this change.
4. When Willow Beard cannot attend Kiddie Academy, Andrew will be given right of first refusal to provide care for her.

If this is your understanding, please sign and return to me tomorrow.

Best Regards,



Shirley Sutherland

**September 15, 2020**

DEFENDANT'S EXHIBIT  
DX 330  
USA v. Elkins, 3:23-CR-2478

NO. 1-19-1345

IN THE INTEREST OF  
WILLOW ANN BEARD  
A CHILD

IN THE DISTRICT COURT  
382ND JUDICIAL DISTRICT  
ROCKWALL COUNTY, TEXAS

PETITIONER'S EXHIBITS LIST TEMPORARY ORDERS

Comes now Andrew C. Beard and files this his exhibits list

1. Requests of the Court
2. Kiddie Academy Enrollment
3. Video of Abduction by Teresa Burkett-Collard

- 1st, 3rd, 5th Friday monthly  
↳ 3pm - Sun 6pm

- Every Thursday @ 3pm to Friday @ 3pm

- 2nd, 4th Friday @ 3pm to Sat 10am

Every  
Thurs - Sat  
3pm - 10am

Every 1st, 3rd, 5th  
weekend - Sun 10am

Plan - Parody Facilitator  
- ASAP -

- Conf. whole stop  
- Send CPS letter  
↳ video, photos, review  
↳ evaluate Teresa's ability  
↳ unrestricted use of photos

case #

PETITION TO MODIFY PARENT CHILD RELATIONSHIP AND  
APPLICATION FOR TEMPORARY RESTRAINING ORDER  
BEARD/BURKETT

Judge was  
impressed  
highlight  
pages 10 & 11

DEFENDANT'S EXHIBIT  
DX 42  
USA v. Elkins, 3:23-CR-2478

**Beard's notes from  
09/30/2020 Court Hearing  
(2 days before he kills  
Alyssa)**



## Reasonable Doubt #14: Beard Not Called as a Witness.



# Jury Verdict Form, Page 1

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA, §  
v. § CRIMINAL ACTION NO. 23-10001  
§  
HOLLY ANN ELKINS, §  
Defendant. §

## VERDICT OF THE JURY

We, the Jury, find Defendant, Holly Ann Elkins:

"Guilty" or "Not Guilty" as to Count 1 of the Indictment: \_\_\_\_\_

"Guilty" or "Not Guilty" as to Count 2 of the Indictment: \_\_\_\_\_

*Only If "Guilty" on Count Two:* Do you unanimously find that the government proved beyond a reasonable doubt that the offense resulted in the death of the victim?  
\_\_\_\_ No \_\_\_\_ Yes

*Proceed to Question Only If "No" Above:* Do you unanimously find that the government proved beyond a reasonable doubt that the offense resulted in life threatening bodily injury to the victim?  
\_\_\_\_ No \_\_\_\_ Yes

*Proceed to Question Only If "No" Above:* Do you unanimously find that the government proved beyond a reasonable doubt that the offense resulted in serious bodily injury to the victim?  
\_\_\_\_ No \_\_\_\_ Yes

We, the Jury, find Defendant, Holly Ann Elkins:

"Guilty" or "Not Guilty" as to Count 1 of the Indictment: \_\_\_\_\_

"Guilty" or "Not Guilty" as to Count 2 of the Indictment: \_\_\_\_\_

*Only If "Guilty" on Count Two:* Do you unanimously find that the government proved beyond a reasonable doubt that the offense resulted in the death of the victim?  
\_\_\_\_ No \_\_\_\_ Yes

*Proceed to Question Only If "No" Above:* Do you unanimously find that the government proved beyond a reasonable doubt that the offense resulted in life threatening bodily injury to the victim?  
\_\_\_\_ No \_\_\_\_ Yes

*Proceed to Question Only If "No" Above:* Do you unanimously find that the government proved beyond a reasonable doubt that the offense resulted in serious bodily injury to the victim?  
\_\_\_\_ No \_\_\_\_ Yes

# Jury Verdict Form, Page 1

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA,       §  
  §  
v.                                       § CRIMINAL ACTION NO. 23-10001  
  §  
  §  
HOLLY ANN ELKINS,               §  
  §  
Defendant.                         §

## VERDICT OF THE JURY

We, the Jury, find Defendant, Holly Ann Elkins:

"Guilty" or "Not Guilty" as to Count 1 of the Indictment: \_\_\_\_\_

"Guilty" or "Not Guilty" as to Count 2 of the Indictment: \_\_\_\_\_

*Only If "Guilty" on Count Two:* Do you unanimously find that the government proved beyond a reasonable doubt that the offense resulted in the death of the victim?  
\_\_\_\_ No \_\_\_\_ Yes

*Proceed to Question Only If "No" Above:* Do you unanimously find that the government proved beyond a reasonable doubt that the offense resulted in life threatening bodily injury to the victim?  
\_\_\_\_ No \_\_\_\_ Yes

*Proceed to Question Only If "No" Above:* Do you unanimously find that the government proved beyond a reasonable doubt that the offense resulted in serious bodily injury to the victim?  
\_\_\_\_ No \_\_\_\_ Yes

We, the Jury, find Defendant, Holly Ann Elkins:

"Guilty" or "Not Guilty" as to Count 1 of the Indictment: \_\_\_\_\_

"Guilty" or "Not Guilty" as to Count 2 of the Indictment: \_\_\_\_\_

*Only If "Guilty" on Count Two:* Do you unanimously find that the government proved beyond a reasonable doubt that the offense resulted in the death of the victim?

☒ No \_\_\_\_ Yes

*Proceed to Question Only If "No" Above:* Do you unanimously find that the government proved beyond a reasonable doubt that the offense resulted in life threatening bodily injury to the victim?

☒ No \_\_\_\_ Yes

*Proceed to Question Only If "No" Above:* Do you unanimously find that the government proved beyond a reasonable doubt that the offense resulted in serious bodily injury to the victim?

☒ No \_\_\_\_ Yes



## Jury Verdict Form, Page 2

*Proceed to Question Only If "No" Above:* Do you unanimously find that the government proved beyond a reasonable doubt that a dangerous weapon was used during the offense?

\_\_\_ No \_\_\_ Yes


"Guilty" or "Not Guilty" as to Count 3 of the Indictment: \_\_\_\_\_

*Only If "Guilty" on Count Three:* Do you find that the firearm was discharged during the

comm

\_\_\_ N

*Proceed to Question Only If "No" Above:* Do you unanimously find that the government proved beyond a reasonable doubt that a dangerous weapon was used during the offense?

 \_\_\_ No \_\_\_ Yes

"Guilty" or "Not Guilty" as to Count 3 of the Indictment: \_\_\_\_\_

*Only If "Guilty" on Count Three:* Do you find that the firearm was discharged during the commission of the offense?

\_\_\_ No \_\_\_ Yes

\_\_\_\_\_  
JURY FOREPERSON



## Jury Verdict Form, Page 2

*Proceed to Question Only If "No" Above:* Do you unanimously find that the government proved beyond a reasonable doubt that a dangerous weapon was used during the offense?

\_\_\_\_ No \_\_\_\_ Yes

"Guilty" or "Not Guilty" as to Count 3 of the Indictment: \_\_\_\_\_


*Only If "Guilty" on Count Three:* Do you find that the firearm was discharged during the

comm

\_\_\_\_ No

Proceed to Question Only If

beyond a reasonable doubt

 \_\_\_\_ No \_\_\_\_ Yes

"Guilty" or "Not Guilty" as to C

Only If "Guilty" on Count Three: Do you find that the firearm was discharged during the commission of the offense?

\_\_\_\_ No \_\_\_\_ Yes

\_\_\_\_\_  
JURY FOREPERSON

Q. (By Mr. Green) Special Agent Hanson, you never located the murder weapon.

A. No.

Q. You don't know if Holly had ever seen that murder weapon.

A. No.

Q. You don't know if she had ever touched that murder weapon.

A. No.

Q. You don't know if she even knew if that murder weapon was in the house.

A. No.

## Jury Verdict Form, Page 2

*Proceed to Question Only If "No" Above:* Do you unanimously find that the government proved beyond a reasonable doubt that a dangerous weapon was used during the offense?

\_\_\_ No \_\_\_ Yes

"Guilty" or "Not Guilty" as to Count 3 of the Indictment: \_\_\_\_\_

*Only If "Guilty" on Count Three:* Do you find that the firearm was discharged during the

comm

\_\_\_ N

*Proceed to Question Only If "No" Above:* Do you unanimously find that the government proved beyond a reasonable doubt that a dangerous weapon was used during the offense?

☒ No \_\_\_ Yes

"Guilty" or "Not Guilty" as to Count 3 of the Indictment: **Not Guilty**

~~*Only If "Guilty" on Count Three:* Do you find that the firearm was discharged during the commission of the offense?~~

~~\_\_\_ No \_\_\_ Yes~~

\_\_\_\_\_  
JURY FOREPERSON

# Jury Verdict Form

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA, §  
v. § CRIMINAL ACTION NO. 3:23-CR-247-B  
§  
§  
HOLLY ANN ELKINS, §  
§  
Defendant. §

VERDICT OF THE JURY

We, the Jury, find Defendant, Holly Ann Elkins:

"Guilty" or "Not Guilty" as to Count 1 of the Indictment: \_\_\_\_\_

"Guilty" or "Not Guilty" as to Count 2 of the Indictment: \_\_\_\_\_

Only If "Guilty" on Count Two: Do you unanimously find that the government proved beyond a reasonable doubt that the offense resulted in the death of the victim?

☒ No ☐ Yes

Proceed to Question Only If "No" Above: Do you unanimously find that the government proved beyond a reasonable doubt that the offense resulted in life threatening bodily injury to the victim?

☒ No ☐ Yes

Proceed to Question Only If "No" Above: Do you unanimously find that the government proved beyond a reasonable doubt that the offense resulted in serious bodily injury to the victim?

☒ No ☐ Yes

Proceed to Question Only If "No" Above: Do you unanimously find that the government proved beyond a reasonable doubt that a dangerous weapon was used during the offense?

☒ No ☐ Yes

"Guilty" or "Not Guilty" as to Count 3 of the Indictment: **Not Guilty**

Only If "Guilty" on Count Three: Do you find that the firearm was discharged during the commission of the offense?

☐ No ☐ Yes

\_\_\_\_\_  
JURY FOREPERSON

\_\_\_\_\_  
DATE



# Jury Verdict Form

<p style="text-align: center;">UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS DALLAS DIVISION</p> <p>UNITED STATES OF AMERICA,       §    § v.   § CRIMINAL ACTION NO. 3:23-CR-247-B    §    § HOLLY ANN ELKINS,                   §    § Defendant.                               §</p> <p style="text-align: center;"><u>VERDICT OF THE JURY</u></p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"><p>We, the Jury, find Defendant, Holly Ann Elkins:</p><p>"Guilty" or "Not Guilty" as to Count 1 of the Indictment: _____</p><p>"Guilty" or "Not Guilty" as to Count 2 of the Indictment: _____</p></div> <p><u>Only If "Guilty" on Count Two:</u> Do you unanimously find that the government proved beyond a reasonable doubt that the offense resulted in the death of the victim?</p> <p><input checked="" type="checkbox"/> No    <input type="checkbox"/> Yes</p>	<p><u>Proceed to Question Only If "No" Above:</u> Do you unanimously find that the government proved beyond a reasonable doubt that a dangerous weapon was used during the offense?</p> <p><input checked="" type="checkbox"/> No    <input type="checkbox"/> Yes</p> <p>"Guilty" or "Not Guilty" as to Count 3 of the Indictment: <b>Not Guilty</b></p> <p><u>Only If "Guilty" on Count Three:</u> Do you find that the firearm was discharged during the commission of the offense?</p> <p><input type="checkbox"/> No    <input type="checkbox"/> Yes</p> <p style="text-align: right;">_____ JURY FOREPERSON</p> <p style="text-align: right;">_____ DATE</p>
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VERDICT OF THE JURY

We, the Jury, find Defendant, Holly Ann Elkins: **Consider Intent**

"Guilty" or "Not Guilty" as to Count 1 of the Indictment: \_\_\_\_\_

"Guilty" or "Not Guilty" as to Count 2 of the Indictment: \_\_\_\_\_



# Jury Verdict Form

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA, §  
v. § CRIMINAL ACTION NO. 3:23-CR-247-B  
§  
§  
HOLLY ANN ELKINS, §  
§  
Defendant. §

VERDICT OF THE JURY

We, the Jury, find Defendant, Holly Ann Elkins:

"Guilty" or "Not Guilty" as to Count 1 of the Indictment: \_\_\_\_\_

"Guilty" or "Not Guilty" as to Count 2 of the Indictment: \_\_\_\_\_

Only If "Guilty" on Count Two: Do you unanimously find that the government proved beyond a reasonable doubt that the offense resulted in the death of the victim?

☒ No ☐ Yes

Proceed to Question Only If "No" Above: Do you unanimously find that the government proved beyond a reasonable doubt that the offense resulted in life threatening bodily injury to the victim?

☒ No ☐ Yes

Proceed to Question Only If "No" Above: Do you unanimously find that the government proved beyond a reasonable doubt that the offense resulted in serious bodily injury to the victim?

☒ No ☐ Yes

Proceed to Question Only If "No" Above: Do you unanimously find that the government proved beyond a reasonable doubt that a dangerous weapon was used during the offense?

☒ No ☐ Yes

"Guilty" or "Not Guilty" as to Count 3 of the Indictment: **Not Guilty**

Only If "Guilty" on Count Three: Do you find that the firearm was discharged during the commission of the offense?

☐ No ☐ Yes

\_\_\_\_\_  
JURY FOREPERSON

\_\_\_\_\_  
DATE

# USA v. HOLLY ANN ELKINS

In Defense of Ms. Elkins

Stephen J. Green

Jeff Daniel Clark

Gabriela Markolovic



**GREENCLARK**

